

<b>Guide for Review of Civil Rights-Related Program Requirements for the HOME Investment Partnerships Program</b>			
<b>Name of Program Participant:</b>			
<b>Staff Consulted:</b>			
<b>Name(s) of Reviewer(s):</b>		<b>Date:</b>	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to monitor a HOME participating jurisdiction's (PJ's) compliance with civil rights-related record keeping and data compilation requirements. It is divided into six sections: Analysis of Impediments to Fair Housing Choice; Beneficiary Data; Displacement and Relocation; Minority Business Enterprises/Women's Business Enterprises; Affirmative Marketing Strategies; and Site and Neighborhood Standards. Failure to maintain records is an indication of noncompliance with the record keeping regulations. While a lack of documentation may not imply discrimination because the PJ's data are a basis for further investigating compliance with nondiscrimination requirements, the CPD reviewer is responsible for transmitting this completed Exhibit (including any supporting documentation) to FHEO upon completion of the monitoring (see Sections 22-3 and 22-4 of the introduction to this Chapter).

**NOTE:** To complete the civil rights-related review of the program participant, this Exhibit is to be completed along with Exhibit 22-6, "Guide for Review of the Civil Rights-Related Program Requirements for Section 504 of the Rehabilitation Act of 1973, as amended," and Exhibit 22-7, "Guide for Review of Section 3 of the Housing and Urban Development Act of 1968."

**Questions:**

A. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

1.

a. Has the PJ completed an analysis of impediments to fair housing choice (AI)? [24 CFR 92.508(a)(7)(i)(C) and 24 CFR 91.225(a)(1)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

Exhibit 22-3  
Fair Housing and Equal Opportunity (FHEO)

b. If the answer to “a” above is “Yes,” when was the AI completed?

**Describe Basis for Conclusion:**

2.

<b>[OS]</b> Does the PJ have records documenting its completed AI as well as information on actions taken by the PJ to remedy or ameliorate the impediments to fair housing choice identified through the analysis in the PJ’s community? [24 CFR 92.508(a)(7)(i)(C) and 24 CFR 91.225(a)(1)]	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes         </div> <div style="text-align: center;"> <input type="checkbox"/> No         </div> </div>
--	---

**Describe Basis for Conclusion:**

3.

Based on this review, is there evidence that raises questions about the accuracy of this PJ’s certification to affirmatively further fair housing (AFFH)? (If yes, include in your response below, i.e., actions were inappropriate for identified impediments).	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes         </div> <div style="text-align: center;"> <input type="checkbox"/> No         </div> </div>
--	---

**Describe Basis for Conclusion:**

B. BENEFICIARY DATA

4.

<b>[OS]</b> For the time period reviewed, did the PJ compile data on persons who had applied for, participated in, or benefited from, programs and activities funded in whole or in part with HOME funds by racial and ethnic groups and, for single heads of households, by gender characteristics? [24 CFR 92.508(a)(7)(i)(A)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

C. DISPLACEMENT AND RELOCATION

5.

<b>[OS]</b> For the period reviewed, did the PJ maintain records on persons displaced by HOME-funded activities, including project occupancy lists identifying the names and addresses of persons occupying the assisted properties and/or occupying/moving into assisted properties upon completion? [24 CFR 92.353(c)(1) and 24 CFR 92.508(7)(iv)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

6.

<b>[OS]</b> For the period reviewed, did the PJ provide displaced persons with information on their rights under the Fair Housing Act: to relocate to residences in areas of non-minority concentration at their option; and for referrals for minority persons to comparable and suitable decent, safe, and sanitary replacement dwellings not located in areas of minority concentration? [24 CFR 42.350(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

**D. MINORITY BUSINESS ENTERPRISES/WOMEN'S BUSINESS ENTERPRISES**

7.

<p><b>[OS]</b> For the period reviewed, did the PJ document its outreach activities to minority business enterprises and women's business enterprises by maintaining:</p> <ul style="list-style-type: none"> <li>a. data on the racial, ethnic and gender characteristics of each business entity receiving a contract or subcontract of \$25,000 or more paid or to be paid with HOME funds;</li> <li>b. data on the amount of the contract or subcontract; and</li> <li>c. documentation of the PJ's affirmative steps to assure that minority business and women's business enterprises have an equal opportunity to compete for contracts and subcontracts as sources of supplies, equipment, construction and services per 24 CFR 85.36(e)?</li> </ul> <p>[24 CFR 92.508(a)(7)(ii)(B) and 24 CFR 92.351(b)]</p>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes         </div> <div style="text-align: center;"> <input type="checkbox"/> No         </div> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

**E. AFFIRMATIVE MARKETING STRATEGIES**

8.

<p><b>[OS]</b> For the period reviewed, did the PJ maintain records of the implementation of its overall affirmative marketing strategy to market units to those least likely to apply without regard to race, color, national origin, sex, religion, familial status, and disability, e.g., a written affirmative marketing strategy; records of actions taken by the PJ to affirmatively market units; and records to assess the results of these actions?</p> <p>[24 CFR 92.351(a)(1)(iv) and 24 CFR 92.508(a)(7)(ii)(A)]</p>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input type="checkbox"/> Yes         </div> <div style="text-align: center;"> <input type="checkbox"/> No         </div> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

9.

<b>[OS]</b> For the period reviewed, did the PJ maintain documentation of steps taken by participating owners to affirmatively market their units funded through the HOME program? [24 CFR 92.351(a)(1)(iv) and 24 CFR 92.508(a)(7)(ii)(A)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	

10.

<b>[OS]</b> If the PJ is a State government, does the PJ have written policies that require its State recipients to adopt affirmative marketing procedures and requirements? [24 CFR 92.351(a)(3)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	

F. SITE AND NEIGHBORHOOD STANDARDS

11.

<b>[OS]</b> For newly constructed rental projects subsidized with HOME funds during the period under review, did the PJ have records documenting the evaluation of sites pursuant to the site and neighborhood standards at 24 CFR 983.6(b) for the project files reviewed? [24 CFR 92.202 and 24 CFR 92.508(a)(3)(xiii)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	